

### III. REMARKS

Claims 1-13 are pending in this application. By this Amendment, claims 5, 6, 9 and 11 have been amended. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. §1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claim 5 was rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. By this amendment, claim 5 has been revised. Accordingly, Applicants request withdrawal of this rejection. Applicants submit that the revision is made only to correct typographical errors and does not affect the patentability of the claimed invention.

In the Office Action, claims 1-6, 8, 9, 11 and 12 were rejected under 35 U.S.C. §103(a) over Kessler et al. (U.S. Patent No. 5,841,973), in view of Moh et al. (U.S. Patent No. 5,910,178); claims 7, 10 and 13 were rejected under 35 U.S.C. §103(a) over Kessler et al., in view of Moh et al., in further view of Blount et al. (U.S. Patent No. 5,222,217), and in further

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view of Whitney (U.S. Patent No. 6,141,701). These rejections are respectfully traversed, for the reasons that follow:

**1. There is no motivation or suggestion to combine Kessler et al. with Moh et al.**

Applicants first respectfully submit that there is no motivation or suggestion to combine Kessler et al. with Moh et al. That is, the systems of Kessler et al. and Moh et al. are used for entirely different stages of communications. As such, there is no suggestion or motivation for making their combinations. Specifically, the system of Moh et al. focuses on message transmission between nodes in a network. *See* Col. 2, lines 56-67 and Col. 4, lines 13-18. As disclosed in Moh et al., a broadcast bit is used to control the destination to which a message is sent. For example, when the broadcast bit is set to "1," the message is sent to all nodes in the network. Conversely, when the broadcast bit is set to "0," the message is sent only to the node written into a destination field. *See* Col. 6 Lines 4-19. In sharp contrast, Kessler et al. addresses the queuing of messages in destination processing elements. Sending message to nodes in a network as taught by Moh et al. is a step that occurs separate and distinct from the message queuing taught by Kessler et al. As such, one of ordinary skill in the art would not have been motivated to combine these references. Accordingly, because there is no suggestion or motivation to combining the cited references, Applicants respectfully request withdrawal of the above-referenced rejections.

**2. The combinations of cited art fail to teach or suggest each and every claimed feature of the current invention.**

Even if, *arguendo*, the Office holds that there is motivation for combining the cited references, Applicants respectfully submit that the combinations of cited art fail to teach each and every feature of the claimed invention. With regard to claims 1, the combination of cited references fails to disclose or suggest, *inter alia*, “providing connection services to each computer program within the group of computer programs to enable access to a shared access memory that is accessible to each of the group of cooperating communication managers[.]” Specifically, in Kessler et al., there is no shared access memory. Rather, Kessler et al. merely disclose local memories (32) of processors (30) that can be accessed by other processors. *See* Col. 5, lines 31-41. This teaching of Kessler et al. is not equivalent to the “shared access memory” in the present invention, which can exist independent to the local memories of each of the group of cooperating communication managers. *See* FIG. 2 of the claimed invention. This glaring deficiency is not remedied by any of the other cited references.

In addition, with regard to claims 1, 6, 9 and 11, the combination does not disclose or suggest, *inter alia*, “providing a set of command target qualifiers specifically identifying at least one of the group of cooperating communication managers to which a command should be targeted, wherein the set of command target qualifiers includes at least one command target qualifier indicating that a command should be targeted to all members of the group of cooperating communication managers[.]” as recited in claim 1, and “particular parameter values of the command target qualifier determine which group of cooperating communication managers

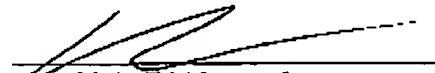
and which communication managers of the group of cooperating communication managers to which the command should be targeted[.]" as recited in claims 6, 9 and 11. These features are not taught or suggested by any of the cited art references. For example, although Moh et al. disclose determining whether a message is to be sent to all nodes or a node written into a Destination Node Identifier (*See* Col. 6, lines 9-15), the determination of message flow in Moh et al. only occurs on one level of destination (i.e., the nodes). However, the present invention, discloses a set of command target qualifier identifying at least one of the group of cooperating communication managers and members of the group of cooperating managers. Thus, there are multiple levels of command targets under the present invention. As such, Applicants respectfully submit that the combinations of cited art fail to teach each and every feature of the claimed invention.

In view of the foregoing, Applicants submit that the claimed invention is patentable and respectfully request withdrawal of the above-referenced rejections.

Claims 2-5 are dependent upon claim 1, claims 7 and 8 are dependent upon claim 6, claim 10 is dependent upon claim 9 and claims 12 and 13 are dependent on claim 11. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

  
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